

1 DOLORES Y. LEAL (134176)
2 OLIVIA FLECHSIG (334880)
3 ALLRED, MAROKO & GOLDBERG
4 6300 Wilshire Blvd. Suite 1500
5 Los Angeles, CA 90048-5217
6 (323) 653-6530
7 dleal@amglaw.com
8 oflechsig@amglaw.com

Attorneys for Plaintiff MARK SNOOKAI

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28	Witness's Name, Title, Affiliation (If Relevant)	Summary of Testimony / Why Testimony Is Unique	Direct Exam (Hours)	Cross Exam (Hours)	Dates of Testimony
	Dr. Victor Adeyeye	At the relevant time, Dr. Adeyeye was a cardiologist for Chevron Nigeria who provided an opinion on Plaintiff's cardiac condition.	1 hr.		
	Dr. Ujomoti Akintunde	At the relevant time, Dr. Akintunde was a Cardiologist in Nigeria who was consulted regarding Plaintiff's medical suitability for expatriate assignment. He assessed Plaintiff's medical condition and made a recommendation for Mr. Snookal's condition.	1 hr.		
	Dr. Eshiofe Asekomeh	Dr. Asekomeh conducted the Medical Suitability for Expatriate Assignment (MSEA) evaluation for Plaintiff. He determined that Plaintiff was not fit for duty based on his medical condition and available medical support.	1.5 hrs.		
	Scott M. Banks	Mr. Banks is an Assistant Secretary of Chevron U.S.A. Inc. and verified various Interrogatory responses on behalf of Chevron U.S.A. Inc. Mr. Banks is expected to testify regarding the information contained in said Interrogatories and factual matters related thereto.	.5 hr.		
	Dr. Charles Baum	Dr. Baum is a professor of economics and finance at Middle Tennessee State University. He has will testify regarding Plaintiff's lost earnings and lost employment benefits due to the rescission of the Expatriate position in Nigeria.	3 hrs.		

1 2 3 Witness's Name, Title, Affiliation (If Relevant)	4 5 6 7 8 Summary of Testimony / Why Testimony Is Unique	9 10 11 12 13 14 15 16 17 Direct Exam (Hours)	18 19 20 21 22 23 24 25 Cross Exam (Hours)	26 27 28 Dates of Testimony
Linda Engel	At the relevant time, Ms. Engel was a Licensed Clinical Social Worker employed by Kaiser Permanente who provided therapy to Plaintiff. She will authenticate her records and testify regarding the therapy and her diagnosis of Plaintiff.	.5 hr.		
Dr. Shahid Hameed Khan	At the relevant time, Dr. Khan was Plaintiff's treating cardiologist who determined that Plaintiff was fit for duty for an expatriate position. After Chevron rescinded the offer of Expatriate assignment, Dr. Khan also communicated with Chevron's Dr. Levy regarding Plaintiff's medical condition and risk of cardiac event. Dr. Khan communicated that Plaintiff's risk of a cardiac event was about 2% per year.	1 hr.		
Dr. Scott Levy	At the relevant time, Dr. Levy was employed by Chevron as a Regional Medical Manager for the Europe, Eurasia, Middle East and Africa Region. He will testify regarding the fitness-for-duty medical evaluations for expatriate assignments. After Plaintiff complained about discrimination and challenged the decision to deem him unfit for duty, Dr. Levy reviewed Plaintiff's case for a second opinion.	2 hrs.		
Cesar Malpica	Mr. Malpica replaced Mr. Zaheer in Escravos, Nigeria for 4 years.	.5 hr.		

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28	Witness's Name, Title, Affiliation (If Relevant)	Summary of Testimony / Why Testimony Is Unique	Direct Exam (Hours)	Cross Exam (Hours)	Dates of Testimony
	Dr. Alexander Marmureanu	<p>Dr. Marmureanu practices Thoracic and Cardiovascular Surgery. He is Board Certified in Cardiothoracic Surgery and General Surgery.</p> <p>Dr. Marmureanu will testify that the clinical data consistently indicates that Mr. Snookal's ascending aortic aneurysm and aortic root have remained stable at 4.2 cm, with no significant progression over several years of monitoring. At this size, in his opinion, the annual risk of rupture or dissection is less than 1%, especially considering the stability of his condition and aortic measurements.</p> <p>Dr. Marmureanu will testify given that Plaintiff's work would be desk-based and not physically demanding, there is no evidence to suggest that his condition would affect his job performance or pose an immediate risk or "direct threat."</p>	3 hrs.		
	Andrew Powers	<p>At the relevant time, Mr. Powers was a Senior Human Resources Manager at Chevron's El Segundo refinery.</p> <p>Plaintiff filed a complaint of disability discrimination with Mr. Powers. Mr. Powers has also had several expatriate assignments to other countries and Chevron USA consistently paid his salary throughout.</p>	1 hr.		

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28	Witness's Name, Title, Affiliation (If Relevant)	Summary of Testimony / Why Testimony Is Unique	Direct Exam (Hours)	Cross Exam (Hours)	Dates of Testimony
Dr. Anthony Reading	Dr. Reading is an expert forensic psychologist who evaluated Mr. Snookal.	3 hrs.			
Constance Snookal	Ms. Snookal is Plaintiff's wife. She will testify regarding her husband's damages as a result of Chevron's rescission of the Reliability Engineering Manager position.	2 hrs.			
Mark Snookal	Plaintiff Mark Snookal will testify regarding his employment at Chevron USA; his application to be a Reliability Engineering Manager, an Expatriate assignment in Escravos, Nigeria; the application process; the two doctors (Dr. Khan and Dr. Sobel) who examined him who concurred that he was fit for duty; the offer of employment; Chevron's rescission of the expatriate assignment; Mr. Snookal's appeal of the rescission decision to Dr. Frangos and Dr. Levy; his complaint to Human Resources; and economic, emotional/psychological damages suffered by him.	8 hrs.			
Dr. Irving Sobel	Dr. Sobel was retained by Chevron as an independent doctor to conduct a fitness for duty examination for the Expatriate assignment in Nigeria.	.75 hr.			
Harpreet K. Tiwana	Harpreet Tiwana is an Assistant Secretary of Chevron U.S.A. Inc. and verified various Interrogatory responses on behalf of Chevron U.S.A. Inc. Harpreet Tiwana is expected to testify regarding the information contained in said	.5 hr.			

1	Interrogatories and factual matters related thereto.			
2	Thalia Tse	At the relevant time, Ms. Tse was Chevron's Human Resources Business Partner at the El Segundo refinery. She reported to Andrew Powers. Ms. Tse was tasked with being familiar with Chevron policies prohibiting discrimination and pay for expatriate/rotational assignments.	.5 hr.	
3	Amir Zaheer	Mr. Zaheer replaced Mr. Snookal in Escravos, Nigeria after Defendant rescinded the job offer.	.5 hr.	
4				
5				
6				
7				
8				
9				
10				
11				
12	Dated: July 1, 2025	ALLRED, MAROKO & GOLDBERG		
13				
14		By: 		
15		DOLORES Y. LEAL		
16		OLIVIA FLECHSIG		
17		Attorneys for Plaintiff,		
18		MARK SNOOKAL		
19				
20				
21				
22				
23				
24				
25				
26				
27				
28				